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IN THE UNITED STATES	
FOR THE NORTHERN DIST	TRICT OF CALIFORNIA
IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INIURY PRODUCTS	MDL No. 3047
LIABILITY LITIGATION	Case Nos. 4:22-md-03047-YGR-PHK
THIS DOCUMENT RELATES TO:	4:23-cv-05448-YGR
People of the State of California, et al. v. Meta Platforms, Inc., et al.	META AND CALIFORNIA GO-BIZ'S STIPULATION AND {PROPOSED} ORDER EXTENDING DEADLINE TO
	BRIEF DISCOVERY DISPUTES
	Judge: Hon. Yvonne Gonzalez Rogers
	Magistrate Judge: Hon. Peter H. Kang
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	COVINGTON & BURLING LLP 1999 Avenue of the Stars Los Angeles, CA 90067 Telephone: +1 (424) 332-4800 Facsimile: +1 (650) 632-4800 Email: asimonsen@cov.com Attorneys for Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC Additional parties and counsel listed on signature page IN THE UNITED STATES FOR THE NORTHERN DIST IN RE: SOCIAL MEDIA ADOLESCENT ADDICTION/PERSONAL INJURY PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: People of the State of California, et al. v. Meta

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Pursuant to Civil Local Rules 6-2 and 7-12, the California Governor's Office of Business and Economic Development ("California GO-Biz") and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, "Meta," and together with California Go-Biz, the "Parties"), through their undersigned counsel, hereby stipulate as follows:

- 1. Meta has requested that California GO-Biz produce certain documents, and discussions about that request remain ongoing.
- 2. On February 13, 2025 (ECF 1696), the Court set certain stipulated discovery deadlines that applied to state agency discovery, including a March 14, 2025 deadline to "substantially complete production of all" agency documents and to "finalize, and, if necessary, brief, all disputes about the scope of the State AGs' and state agencies' responses and objections to Meta's existing RFPs." See ECF 1696.
- 3. In light of the Parties' ongoing efforts to reach agreement about California GO-Biz's responses to Meta's request for production, the Parties agree, subject to Court approval, to set a different deadline of April 14, 2025 for California GO-Biz to substantially complete production of documents and to finalize, and if necessary, brief any disputes about the scope of California GO-Biz's responses and objections to Meta's request for documents from California GO-Biz.
- 4. The deadlines set forth in this stipulation will not automatically affect other deadlines in the case schedule, but they may or may not require future requests by the Parties and future action by the District Court on other deadlines in the case schedule. The Parties reserve all rights with respect to other changes to deadlines.
- 5. Therefore, the Parties agree, subject to the Court's approval, that the deadline for California GO-Biz to substantially complete production of documents, and for the Parties to finalize, and, if necessary, brief, all disputes about the scope of the California GO-Biz's responses and objections to Meta's request for production shall be April 14, 2025.

1 2 IT IS SO STIPULATED AND AGREED. 3 Respectfully submitted, 4 DATED: March 14, 2025 By: /s/ Margaret R. Prinzing 5 **OLSON REMCHO, LLP** 6 Margaret R. Prinzing (CA SBN 209482) 7 Olson Remcho, LLP 8 1901 Harrison Street, Suite 1550 Oakland, CA 94612 9 Phone: (510) 346-6200 Fax: (510) 574-7061 10 Email: mprinzing@olsonremcho.com 11 Attorneys for Non-Party the Governor's Office of 12 Business and Economic Development 13 By: /s/ Ashley M. Simonsen 14 15 **COVINGTON & BURLING LLP** 16 Ashley M. Simonsen, SBN 275203 COVINGTON & BURLING LLP 17 1999 Avenue of the Stars Los Angeles, CA 90067 18 Telephone: (424) 332-4800 Facsimile: + 1 (424) 332-4749 19 Email: asimonsen@cov.com 20 Phyllis A. Jones, pro hac vice 21 Paul W. Schmidt, pro hac vice **COVINGTON & BURLING LLP** 22 One City Center 23 850 Tenth Street, NW Washington, DC 20001-4956 24 Telephone: + 1 (202) 662-6000 Facsimile: +1 (202) 662-6291 25 Email: pajones@cov.com 26 Attorneys for Defendants Meta Platforms, Inc.; 27 Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC 28

SIGNATURE CERTIFICATION

Under Civ. L.R. 5-1(h)(3), I, Ashley M. Simonsen, hereby attest that all signatories listed, and on whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

DATED: March 14, 2025 /s/ Ashley M. Simonsen

Ashley M. Simonsen

Counsel for Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: March 14, 2025

UNITED STATES MAGISTRATE JUDGE